

1 AARON D. FORD  
2 Attorney General  
3 ALEXANDER J. SMITH (Bar No. 15484)  
4 Deputy Attorney General  
State of Nevada  
Office of the Attorney General  
5 555 East Washington Avenue  
Suite 3900  
Las Vegas, Nevada 89101  
(702) 486-4070 (phone)  
(702) 486-3773 (fax)  
Email: ajsmith@ag.nv.gov

7 *Attorneys for Defendants*  
8 *Monique Hubbard-Pickett,*  
*Julie Matousek, Brian Williams,*  
*Jeremy Bean, Julio Calderin,*  
*Harold Wickham, Bob Faulkner,*  
10 *Michael Minev, Martin Naughton,*  
*Louisa Sanders, Albert Castellan,*  
*Jaymie Cabrera, Nonilon Peret,*  
11 *and Craig Rose*

12

13 **UNITED STATES DISTRICT COURT**  
14 **DISTRICT OF NEVADA**

15 JUSTIN PAULO,  
16 Plaintiff,  
17 v.  
18 BRIAN WILLIAMS, *et al.*,  
19 Defendants.

Case No. 2:19-cv-00474-APG-NJK

DEFENDANTS' MOTION FOR A  
TWO-DAY EXTENSION OF TIME TO  
RESPOND TO PLAINTIFF'S  
NOVEMBER 29, 2021 MOTION  
(ECF NO. 61) FOR SANCTIONS

(First Request)

21 Defendants, Monique Hubbard-Pickett, Julie Matousek, Brian Williams, Jeremy  
22 Bean, Julio Calderin, Harold Wickham, Bob Faulkner, Michael Minev, Martin Naughton,  
23 Louisa Sanders, Albert Castellan, Jaymie Cabrera, Nonilon Peret, and Craig Rose, by and  
24 through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Alexander  
25 J. Smith, Deputy Attorney General of the State of Nevada, Office of the Attorney General  
26 hereby move under Rule 6, Federal Rules of Civil Procedure; Local Rule (LR) IA 6-1; and  
27  
28

1 LR 26-3 for an extension of time of two days from December 13, 2021, to December 15,  
2 2021, to respond to Plaintiff Justin Paulo's motion (ECF No. 61) for sanctions.

3 The facts as to why counsel for the defense has recently had to move for several  
4 extensions to respond to an order (ECF No. 55) in this action are clearly set out in  
5 ECF Nos. 59 and 62, namely that the above has recently suffered from several debilitating  
6 medical symptoms as well as going through a COVID scare. The PCR test came back  
7 negative, but defense counsel has continued recovering from what appears to be the flu;  
8 although he continued working throughout that period, his performance was slowed and  
9 he is now playing catch-up with various dispositive motions—for example, on Monday of  
10 next week two dispositive motions are due in addition to a response to a pending motion  
11 for partial summary judgment—in addition to required responses to smaller items such as  
12 this. Also, just a couple of minutes ago, defense counsel moved (ECF No. 64) to extend the  
13 time by two-days to respond to ECF No. 55.

14 Defense counsel is responsible for approximately fifty cases, so handling them has  
15 proved more challenging whilst laboring under the symptoms of a bad respiratory infection;  
16 however, defense counsel is on the mend and working assiduously to catch-up. For obvious  
17 reasons outlined in this motion and in ECF Nos. 59, 62, and 64, Defendants demonstrate  
18 good cause and respectfully request an additional two days to finalize their response to  
19 ECF No. 61, thus taking the due date from December 13, 2021, to December 15, 2021.

20 DATED this 13th Day of December, 2021.

21 AARON D. FORD  
22 Attorney General

23 IT IS SO ORDERED.

24 Dated: December 14, 2021

By: /s/ Alexander J. Smith  
25 ALEXANDER J. SMITH (Bar No. 15484)  
Deputy Attorney General

Attorneys for Defendants

26 United States Magistrate Judge